



ChargePoint, Inc.
254 East Hacienda Avenue | Campbell, CA 95008 USA
+1.408.841.4500 or US toll-free +1.877.370.3802

March 10, 2022

**Connecticut Transportation Committee
Connecticut Environment Committee**

RE: SB0004, An Act Concerning the Connecticut Clean Air

Representative Lemar, Senator Haskell, Senator Cassano, Representative Simms, Representative Carney, Senator Somers and Members of the Transportation

Committee Senator Cohen, Representative Gresko, Senator Slap, Representative Palm, Senator Miner, Representative Harding and Members of the Environment Committee

Thank you for the opportunity to provide written testimony on the above-referenced legislation and for your commitment to the electrification of transportation in Connecticut. ChargePoint is a strong supporter of the complete decarbonization of the transportation system and continues to look for ways to partner with public and private partners throughout the State to help achieve statewide energy and environmental goals. We are very supportive of the intent of SB0004 but are concerned with three specific sections: the ten percent parking exception for associations, and the limits on rental units. We have offered suggestions to the language below and are happy to discuss these in more depth as needed.

I. Background on ChargePoint

ChargePoint is the nation's leading electric vehicle ("EV") charging network, with charging solutions for every charging need and all the places EV drivers go: at home, work, around town and on the road. ChargePoint's primary business model is not to operate charging stations ourselves, but to provide smart, networked charging solutions directly to businesses and organizations. We are committed to making it easy for cities, towns, state agencies, businesses, multifamily buildings, fleet operators, as well as individual drivers and public transit riders to go electric.

Our free downloadable app allows drivers to find charging stations (not only our stations but other stations under networks we have roaming agreements with), access data about how long a session takes, and pay for their session if payment is required. Site hosts can use our software to collect data about drivers and charge fees. We believe smart networked charging is the way of the future and are committed to making the experience a positive one for the driver and the owners and operators of our chargers. Additionally, ChargePoint has designed its network to allow other parties, such as electric utilities, the ability to access charging data and conduct load management to enable efficient EV load integration onto the electric grid.

II. Position on Bills

SB0004, An Act Concerning the Connecticut Clean Air
Support with Changes

ChargePoint is committed to making it easier for every driver, regardless of where they live, to access EV charging at home. We very much support and appreciate the intent of SB0004 which would expand the “right to charge” for condominium owners and renters throughout Connecticut. This bill is consistent with bills passed recently in New York and New Jersey and laws in place in many other states.

We respectfully ask the Committee to consider our following concerns about the bill as drafted:

Ten Percent Caveat: We respectfully urge the Committee to amend language in Section 2. (lines 124-126) that allows a homeowner association to prohibit or restrict the installation of chargers if they “*already provides electric vehicle charging stations to its unit owners at a ratio that is equal to or greater than ten per cent of the designated parking spaces.*” We recommend striking this carve out for homeowner associations as it would unfairly restrict homeowners from installing EV chargers at their own expense. As more drivers make the switch to EV, they are going to need flexibility to install chargers if they need to, especially those who live in a multi-unit dwelling. As drafted, if an association provides two chargers in a parking lot with twenty spots, they could potentially prohibit an owner from installing a charger.

Limit for Rental Units: We are also concerned with the language in Section 3. (lines 220-222) which exempts landlords from having to approve a request to from a renter to install a charger if they have provided them at a ratio that is equal to or greater than ten percent- “*Electric vehicle charging stations for use by tenants already exist as of the effective date of this section in a ratio that is equal to or greater than ten per cent of the designated parking spaces.*” We recommend striking this language entirely from the bill. Again, as the market grows, renters will need flexibility to request a charger be installed.

EV Readiness in New Construction: We very much applaud the Committees for their inclusion of language to update the State Building Code to include EV readiness. We recommend that for Section 4.(b)(2)(Lines 285-290) the language be amended to match the amperes and volt needed to support Level 2 Chargers and recommend an increase in the percentage of spaces, as required by the bill.:

Current language: each new construction of a commercial building, install equipment capable of supporting a level two electric vehicle charging station and include a dedicated twenty amperes, one hundred twenty volt outlet capable of supporting electric vehicle charging in at least ten per cent of the designated parking spaces of such commercial building.

Suggested amendment: each new construction of a commercial building, install equipment capable of supporting a level two electric vehicle charging station and include a dedicated electric circuit with 40 amperes, 208/240 capacity capable of supporting electric vehicle charging in at least twenty per cent of the designated parking spaces of such commercial building

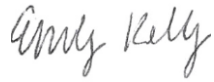
As drafted, a twenty amperes, one hundred twenty volt outlet could not support a Level 2 charger. That outlet could only support a Level 1 charger¹. In addition, ChargePoint advocates for twenty percent of parking be EV Ready at a minimum in order to support the expected increase in EV use in the next decade.

III. Conclusion

¹ <https://www.swenergy.org/transportation/electric-vehicles/building-codes#capacity>

Thank you again for the opportunity to provide feedback on the proposed legislation included in this testimony. ChargePoint applauds the Committee for its focus on transportation electrification as one of the keys to unlocking further greenhouse gas emission reductions in the State. We look forward to serving as a resource to the Committee as it continues to evaluate policies that can make it easier for all EV drivers to charge, regardless of where they live.

Sincerely,

A handwritten signature in cursive script that reads "Emily Kelly".

Emily Kelly
Manager – Northeast Region, Public Policy
ChargePoint